<u>REMARKS</u>

The application has been reviewed in light of the Office Action mailed June 17, 2004.

Claims 1-30 are pending in this application, and all claims were rejected in the instant Office

Action. There are no amendments to the claims in response to the prior art cited.

<u>Rejections under 35 U.S.C. § 102(e)</u>

The examiner rejected claims 1-30 rejected under 35 U.S.C. 102(e) as being anticipated

by Soltis et al, U.S. Patent No. 6,493,804 (hereinafter, "Soltis").

> As per claim 1, the examiner argued that:

> **Soltis discloses a system for storage in a storage network, the storage network including a file system server which manages access to storage according to a file system architecture using, file system parameters, a plurality of clients of the file system server and one or more storage systems, comprising:**

> **a plurality of communication interfaces, adapted for connection via communication media to respective ones of the plurality of clients and one or more storage systems (col. 5, lines 25-45); and**

> **processing resources, coupled with the plurality of communication interfaces, which manage communication via said plurality of communication interfaces according to a storage area network protocol which identifies units of storage according to storage area network parameters, and including logic to identify a particular message received from one of the plurality of clients under the storage area network protocol as a message relating to the file system architecture, to parse the particular message for file system parameters of an access according to the file system architecture, and to translate said file system parameters to an access using storage area network parameters (col. 5, lines 25-45, col. 6, lines 66-67, col. 7, lines 1-34, col. 8, lines 61-67, col. 9, lines 1-41 and col. 15, lines 27-39).**

The rejection is respectfully traversed. The Applicant has carefully reviewed Soltis. As a result

of that review, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach

logic to identify a particular message received from one of the plurality of clients under the

storage network protocol as a message relating to the file system architecture, led alone to parse

the message for file system parameters of an access according to the file system structure.

Consequently, Soltis does not anticipate claim 1. Moreover based upon what Soltis does teach, namely device locking, Soltis does not teach or render obvious claim 1 because the logic to identify a particular message received from one of the plurality of clients under the storage network protocol as a message relating to the file system architecture is not disclosed, discussed, nor would it need to be disclosed because Soltis is directed to another purpose. Reconsideration and withdrawal of the invention are respectfully requested.

As per claim 11, the examiner argued that:

Soltis discloses a method for access to storage resources by a plurality of clients in a storage network operating according to a storage area network protocol, comprising:

providing a file system server in the storage area network, and in communication with the plurality of clients for file access management via a communication network, which manages access to storage according to a file system architecture (col. 5, lines 25-45);

installing an intermediate system in the storage area network between the plurality of clients and storage resources in the storage area network (col. 8, lines 61-67 and col. 9, lines 1-4);

identifying a particular message received in the intermediate system from one of the plurality of clients under the storage area network protocol as a message relating to the file system (col. 8, lines 11-20, lines 61-67 and col. 9, lines 1-4);

parsing the particular message in the intermediate system for file system parameters of an access according to the file system architecture (col. 8, lines 61-67, col. 9, lines 1-4, col. 11, lines 63-67 and col. 12, lines 1-26);

translating said file system parameters to an access using storage area network parameters (col. 19, lines 15-44); and

routing said access using the storage area network parameters through the intermediate device (col. 19, lines 15-44).

The rejection is respectfully traversed. It is respectfully submitted that Soltis does not anticipate, disclose or teach identifying a particular message received from one of the plurality of clients under the storage network protocol as a message relating to the file system architecture, led alone

to parsing the message for file system parameters of an access according to the file system structure. Consequently, Soltis does not anticipate claim 11. Moreover based upon what Soltis does teach, namely device locking, Soltis does not teach or render obvious claim 11 because the step of identifying a particular message received from one of the plurality of clients under the storage network protocol as a message relating to the file system architecture is not disclosed, discussed, nor would it need to be disclosed because Soltis is directed to another purpose. Reconsideration and withdrawal of the invention are respectfully requested.

As per claim 21, the examiner argued that:

Soltis discloses an article of manufacture, comprising a machine readable storage medium and a computer program stored therein, the computer program for operation in an intermediate device in a storage network, the storage network including a file system server which manages access to storage according to a file system architecture using tile system parameters a plurality of clients of the file system server and one or more storage systems, and comprising:

program instructions which upon execution in the intermediate device manage communication via said plurality of communication interfaces according to a storage area network protocol which identifies units of storage according to storage area network parameters, identifies a particular message received from one of the plurality of clients under the storage area network protocol as a message relating to the file system architecture, parses the particular message for file system parameters of an access according to the file system architecture, and translates said file system parameters to an access using storage area network parameters (col. 5, lines 25-45, col. 6, lines 66-67, col. 7, lines 1-34, col. 8, lines 61-67, col. 9, lines 1-41 and col. 15, lines 27-39).

The rejection is respectfully traversed. It is respectfully submitted that Soltis does not anticipate, disclose or teach program instructions which upon execution in the intermediate device manage communication via said plurality of communication interfaces according to a storage area network protocol which identifies units of storage according to storage area network parameters, identifies a particular message received from one of the plurality of clients under the storage area network protocol as a message relating to the file system architecture, led alone program

instructions that parses the particular message for file system parameters of an access according to the file system architecture, and translates said file system parameters to an access using storage area network parameters. Consequently, Soltis does not anticipate claim 21. Moreover based upon what Soltis does teach, namely device locking, Soltis does not teach or render obvious claim 21 because the step of identifying a particular message received from one of the plurality of clients under the storage network protocol as a message relating to the file system architecture is not disclosed, discussed, nor would it need to be disclosed because Soltis is directed to another purpose. Reconsideration and withdrawal of the invention are respectfully requested.

As per claims 2, 12 and 22, the examiner argued that:

Soltis discloses:

wherein said file system parameters comprise file access block parameters (abstract, col. 2, lines 47-67, col. 3, lines 1-2, col. 11, lines 64-67 and col. 12, lines 1-26).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 2, 12, and 22 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 3, 13 and 23, the examiner argued that:

Soltis discloses:

wherein said storage area network protocol comprises a protocol compliant with a Standard Small Computer System Interface SCSI protocol (abstract, and col. 7, lines 19-34).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 3, 13, and 23 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 4, 14 and 24, the examiner argued that:

Soltis discloses:

wherein said storage area network protocol comprises a protocol compliant with a standard Fibre Channel Protocol FCP (col. 6, lines 66-67 and col. 7, lines 1-51).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 4, 14, and 24 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 5, 15 and 25, the examiner argued that:

Soltis discloses:

wherein said resources comprise memory and a computer program stored in the memory for mapping logical file identification parameters to physical storage block parameters (col. 15, lines 27-37).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 5, 15, and 25 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 6,16 and 26, the examiner argued that:

Soltis discloses:

wherein said particular message comprises a command according to the storage area network protocol directed to a file system virtual volume (col. 8, lines 61-67 and col. 9, lines 1-28).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 6, 16, and 26 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 7, 17 and 27, the examiner argued that:

Soltis discloses:

wherein said particular message comprises a command according to the storage area network protocol directed to physical block outside an actual range physical blocks accessible in the storage area network (col. 11, lines 63-67 and col. 12, lines 1-26).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 7, 17, and 27 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claim 8, 18 and 28, the examiner argued that:

Soltis discloses:

wherein said particular message comprises a command compliant with a SCSI write command with at least a portion of said file system access parameters carried in a buffer associated with the command (col. 9, lines 42-62, col. 14, lines 56-67 and col. 15, lines 1-4).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 8, 18, and 28 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claim 9, 19 and 29, the examiner argued that:

Soltis discloses:

wherein the resources further include logic for logical bounds checking for said particular message (col. 11, lines 63-67 and col. 12, lines 1-26).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 9, 19, and 29 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

As per claims 10, 20 and 30, the examiner argued that:

Soltis discloses:

wherein the resources further include logic for access control for said particular message (col. 19, lines 15-47).

The rejection is respectfully traversed. For the reasons provided above for the independent claims 1, 11 and 21, the Applicant respectfully submits that Soltis does not anticipate, disclose or teach all of the limitations of the independent claims, and thus the Applicant respectfully submits that the independent claims are allowable over the prior art of record. As the claims dependent upon the independent claim automatically include all of the limitations of their respective independent claim (and any intermediary claims), it is respectfully submitted that the dependent claims 10, 20, and 30 are similarly allowable over the prior art of record. Reconsideration and withdrawal of the rejection are respectfully requested.

All amendments are made in a good faith effort to advance the prosecution on the merits. Applicants reserve the right to subsequently take up prosecution on the claims as originally filed in this or appropriate continuation, continuation-in-part and/or divisional applications.

Applicants respectfully request that the amendments submitted herein be entered, and further request reconsideration in light of the amendments and remarks contained herein.

Applicants respectfully submit that no amendments have been made to the pending claims for the purpose of overcoming any prior art rejections that would restrict the literal scope of the claims or equivalents thereof.

Applicants respectfully request withdrawal of all rejections, and that there be an early notice of allowance.
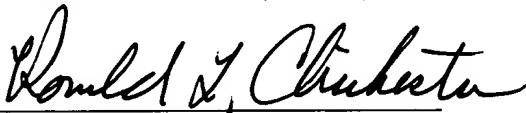
SUMMARY

In light of the above remarks Applicants respectfully submit that the application is now in condition for allowance and early notice of the same is earnestly solicited. Should the Examiner have any questions, comments or suggestions in furtherance of the prosecution of this application, the Examiner is invited to contact the attorney of record by telephone or facsimile.

Applicants believe that there are no fees due in association with the filing of this Response. However, should the Commissioner deem that any fees are due, including any fees for extensions of time, Applicants respectfully request that the Commissioner accept this as a Petition Therefor, and direct that any and all fees due are charged to Baker Botts L.L.P. **Deposit Account No. 02-0383**, *(formerly Baker & Botts, L.L.P.)* **Order Number 016295.1112**

Respectfully submitted,

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